

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

In re:	)	Case No. 24-80617
	)	(Chapter 11)
C M HEAVY MACHINERY, LLC	)	
	)	
Debtor.	)	
	)	

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**APPLICATION TO APPROVE EMPLOYMENT OF LOGAN DAHLK AND  
RECEIVABLES CONTROL CORP. AS ACCOUNTS RECEIVABLE  
COLLECTION AGENTS TO ABOVE-CAPTIONED DEBTOR**

Comes now C M Heavy Machinery, LLC (“CMHM” or the “Debtor”), pursuant to Sections 327 of Title 11 of the United States Code (the “Bankruptcy Code”), as well as Federal Rule of Bankruptcy Procedure 2014, and applies to engage Logan Dahlk and Receivables Control Corp (collectively, “RCC”), accounts receivable collection agents for the Debtor, to assist in the identification, collection, and recovery of outstanding receivables owed to the Debtor’s estate, and in support thereof states as follows:

1. This case was commenced when the Debtor filed a petition for Chapter 11 relief, pursuant to Section 301 of the Bankruptcy Code, on August 7, 2024.
2. The Debtor is, and at all times relevant has been, a debtor in possession.
3. Approval is instantly sought of RCC’s employment to provide the following services to the Debtor as accounts receivables collection agents:
  - a. Identify and verify all outstanding accounts receivables;
  - b. Contacting account debtors to secure timely payments
  - c. Negotiating payment plans or settlements, if necessary, to maximize recovery;

d. Providing regular reports on collection efforts and expected receivable recoveries;

e. Advising the Debtor on receivable-related disputes and potential litigation strategies, if applicable.

4. RCC does not represent any other person or entity in connection with this case, and both RCC and its principal are disinterested as that term is used in Section 101(14) of the Bankruptcy Code. RCC is not a creditor or an insider of the Debtor; was not, within two years before the date of the petition for relief, a director, officer, or employee of the Debtor; and does not have any interest materially adverse to the interests of the estate or any class of creditors or equity holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor (or for any other reason). Further, RCC holds no interest adverse to the interests of the Debtor in connection with any of the matters for which employment is sought.

5. RCC has no legal connection with the Debtor, the creditors herein, or any other parties in interest, nor with their respective counsel, nor with the United States Trustee or any person employed in the office of the United States Trustee.

6. The Debtor has agreed to provide compensation to RCC pursuant to the terms set forth in the attached Rate Agreement. All compensation sought in this matter will be subject to the review and approval of the United States Bankruptcy Court for the Eastern District of Oklahoma.

7. Attached hereto, and incorporated herein by reference, is the declaration of Logan Dahlk in support of this application.

8. Attached hereto, and incorporated herein by reference, is a Rate Agreement signed by the Debtor and RCC prior to the filing of this application for employment. All parties agree that the agreement shall not become effective unless and until the application is granted.

WHEREFORE, the Debtor respectfully prays this Honorable Court (i) enter an order approving the employment of Logan Dahl. and Receivables Control Corp. as accounts receivables collection agent, and (ii) afford such other and further relief as may be just and proper.

Respectfully Submitted,

Dated: March 19th, 2025

By: /s/ Christianna A. Cathcart  
Christianna A. Cathcart, Esq.  
The VerStandig Law Firm, LLC  
9812 Falls Road, #114-160  
Potomac, Maryland 20854  
Phone: (301) 444-4600  
christianna@dakotabankruptcy.com  
*Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this day of , 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Christianna A. Cathcart  
Christianna A. Cathcart, Esq.